

98-133

Santa Clara Valley Water District

6760 ALMADEN EXPRESSWAY
SAN JOSE, CA 95118-8686
TELEPHONE (408) 265-2500
FACSIMILE (408) 266-0271
WWW.SCVWD.CA.US

AN EQUAL OPPORTUNITY EMPLOYER

August 26, 1998

Mr. Lester A. Snow
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Comments on August 5 Version of "Developing a Draft Preferred Program Alternative"

Dear Lester:

Thank you for providing the opportunity for the Santa Clara Valley Water District to comment on the subject document. We appreciate your efforts to incorporate comments from stakeholders in the development of the implementation framework.

Balanced Implementation Packages

We support a phased implementation approach for a program of such complexity. We also agree that some components of the program may need to be subjected to a phased decision-making process to facilitate further information gathering and to allow for adaptive management to be applied across all program elements. However, we urge CALFED to abide by its solution principle of equity through all phases of program development and implementation. Each package to be implemented within each stage must be balanced in making progressive achievement across all of the four program objectives.

Long-term, Comprehensive Solution Package

We urge CALFED to design the implementation framework within the context of a long-term solution package. In other words, the preferred alternative identified in the Programmatic EIR/EIS (PEIR/EIS) must be a comprehensive, long-term solution package that meets all of the program objectives. The PEIR/EIS must also provide adequate basis for the necessary findings that will allow all program elements subsequently to be implemented in balanced stages according to an agreed-upon framework.

Drinking Water Quality Improvements in Stage 1

CALFED must provide for drinking water quality improvements in Stage 1. The current Stage 1 implementation plan does not provide urban water users the assurance that drinking water quality concerns are adequately addressed. Specifically, the Water Quality Common Program must include actions to reduce disinfection-by-product precursors such as total organic carbon loadings that degrade drinking water quality. Immediate actions and studies that need to be undertaken within Stage 1 include: changes in drainage release patterns, treatment of agricultural drainage, relocation of agricultural drains away from major municipal intakes, watershed management, research on sources of total organic carbon, and active land management.

No Re-Directed Impacts on Drinking Water Quality

In addition, CALFED must protect drinking water quality from degradation due to implementation of other

program elements. Urban water users are concerned that constituents such as organics, salinity, and total dissolved solids could increase due to actions to address fisheries recovery and to implement the ecosystem restoration program.

Isolated Facility Must Remain a Viable Alternative

CALFED must meet its program objective of improving water quality for all beneficial uses. Meeting drinking water quality needs to protect public health is a long-term objective that must be provided for within and beyond Stage 1. Feasibility planning and other appropriate actions that may be needed to maintain the viability of the isolated facility must begin within Stage 1 to enable this contingency element to be ready for implementation if the triggering conditions are met. Financing to begin feasibility studies must be secured early in Stage 1.

Water Supply Reliability

CALFED must meet its program objective of improving water supply reliability. Stage 1 must include projects and operating criteria that increase opportunities for water storage and water transfers for all beneficial uses. In addition, the Preferred Alternative must acknowledge and accommodate the water quality prerequisites necessary to develop some "soft path" elements that are proposed to improve water supply reliability. For example, the development of affordable, efficient water recycling and groundwater storage programs depends on a CALFED long-term solution which results in lower total dissolved solids (TDS).

Financial Support for Conservation and Recycling Projects

Since Stage 1 implementation focuses heavily on water use efficiency elements, CALFED must provide substantial financial support to jump-start projects that are not feasible at the local levels. In particular, urban recycling projects require tremendous financial and technical assistance to be successfully implemented. CALFED should target efforts that provide broad, regional benefits and/or multiple benefits in receiving financial and technical assistance.

Thank you for your consideration of our comments. We are committed to work constructively with CALFED in the further development of the preferred alternative and its implementation.

Sincerely,



Walter L. Wadlow
Assistant General Manager